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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

Jose A. Iraheta Hernandez,
Plaintiff/s,

vs.

Backgroundchecks.com, LLC,
Defendant/s.

Case No. 2:20-cv-01766-GMN-BNW

**STIPULATION FOR AN EXTENSION OF
TIME FOR DEFENDANT TO FILE
REPLY IN SUPPORT OF ITS MOTION
TO DISMISS THE SECOND AMENDED
COMPLAINT, OR, ALTERNATIVELY,
TRANSFER VENUE**

(THIRD REQUEST)

JOSE A. IRAHETA HERNANDEZ (“Plaintiff”) and BACKGROUNDCHECKS.COM LLC
 (“Defendant”), by and through their undersigned counsel, hereby agree and stipulate to extend the time
 for Defendant to file its reply in support of its Motion to Dismiss the Second Amended Complaint, or,
 Alternatively, Transfer Venue filed on January 11, 2021 (ECF No. 24) by an additional three days, up
 to and including **February 26, 2021**.

This is the third request for an extension of the reply deadline. On January 25, 2021, the

parties submitted a stipulation to extend the opposition and reply deadlines to the Motion to Dismiss the Second Amended Complaint, or, Alternatively, Transfer Venue by one week (ECF No. 27). On February 9, 2021, the parties submitted a second stipulation to extend the reply deadline by one week, which is still pending with the Court (ECF No. 32).

The requested extension is necessary because of the recent historic winter storm causing significant power and water outages throughout the state of Texas. The extension will provide Defendant sufficient time to finalize its reply brief with its client representative, who is located in Texas and has had intermittent power for several days. This extension is sought in good faith and is not made for the purposes of delay. The parties agree that good cause exists for this extension.

Dated: February 22, 2021

Dated: February 22, 2021

Respectfully submitted,

Respectfully submitted,

/s/ Michael Kind

MICHAEL KIND, ESQ.
KIND LAW

GEORGE HAINES, ESQ.
GERARDO AVALOS, ESQ.
FREEDOM LAW FIRM, LLC

Attorneys for Plaintiff
JOSE A. IRAHETA HERNANDEZ

/s/ Diana G. Dickinson

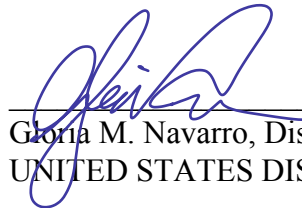
WILLIAM J. SIMMONS, ESQ.
DIANA G. DICKINSON, ESQ.
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Attorneys for Defendant
BACKGROUNDCHECKS.COM LLC

IT IS SO ORDERED.

IT IS FURTHER ORDERED that the Stipulation for Extension of Time (Second Request), (ECF No. 32), is **GRANTED** *nunc pro tunc*.

Dated this 22 day of February, 2021.



Gloria M. Navarro, District Judge
UNITED STATES DISTRICT COURT

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